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FCC Mail Room

December 14, 2009

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Notice of Inquiry, *Fostering Innovation and Investment in the Wireless Communications Market; A National Broadband Plan for Our Future*, GN Docket Nos. 09-157, 09-51 (rel. Aug. 27, 2009).

Dear Ms. Dortch:

As the FCC considers the issue of innovation, investment and regulation in the wireless communications market, I would like to highlight a few issues that sit front and center of the next wave of innovation. These affect the speed at which U.S. wireless innovation can take place, but also the way in which we believe it needs to happen.

Vlingo, based in Cambridge, MA, is a technology start-up solving real problems for consumers by developing advanced speech to text technology that can be used for many mobile functions, including reducing distracted driving dangers. As a start-up company, Vlingo has faced the same challenges as others due to semi-closed wireless networks that require custom integration with each device and technology platform. Walled gardens and closed networks are major hurdles to our company and inhibit overall innovation. Vlingo has largely been successful working within these constraints and we are proud to have millions of consumers using our mobile speech applications. However, while we are happy with our accomplishments, Vlingo adoption could be exponentially greater given an open network environment.

The market has shown some important signs of progress but there is still a long journey ahead toward open networks. A key example of the progress made to date is the openness created by the introduction of the iPhone App Store with AT&T and the subsequent BlackBerry App Store which have brought forth new opportunities for Vlingo, and many others, to deploy more quickly in the market. Apple and BlackBerry have proven that a friction-free ecosystem can be built to allow independent software vendors (ISVs) to address this market. Meanwhile, venture capital investors poured \$215 million last quarter alone into emerging mobile companies here in New England. It is clear that the appetite and ability to innovate in the mobile market is here.

We believe that the market will ultimately resolve the openness issue. Regulation is an important tool, but can often have unintended consequences. We think the onus and incentives reside with the carriers, who are best positioned to respond to this issue quickly and efficiently. This is critical given the

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fast pace at which high tech markets move. Likewise, we believe that the carriers and technology suppliers that make the boldest moves toward openness should be able to reap the greatest rewards in the marketplace. Simply put, the first wireless operator to create a truly open platform will experience a flood of innovation as entrepreneurs and device makers rush in to provide compelling products and services. Other operators will have to follow this lead or watch their market share diminish as innovation and customers flow to the open networks. Only true innovation will provide the largest return and the market must drive this to fruition.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Grannan", with a long horizontal flourish extending to the right.

Dave Grannan  
CEO  
Vlingo Corporation